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Filing date: **05/08/2009**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91179480
Party	Plaintiff Plasti-Fab Ltd.
Correspondence Address	David E. Sipiora Townsend and Townsend and Crew LLP 1400 Wewatta Street, Suite 600 Denver, CO 80202 UNITED STATES denverteas@townsend.com, desipiora@townsend.com
Submission	Other Motions/Papers
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Date	05/08/2009
Attachments	2009 0508 Opposer's Motion for Suspension.pdf (3 pages)(365514 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE
TRADEMARK TRIAL AND APPEAL BOARD**

In re: Application Ser. Nos. 79/023,935 and 79,023,934
Published: August 7, 2007, in the Official Gazette
Mark: **GEOSPEC and ACERA GEOSPEC (and design)**
Filed: March 30, 2006

PLASTI-FAB LTD.,

Opposer,

v.

Consolidated Opposition Nos.
91179480 (parent) and 91179842

KOBELCO CONSTRUCTION
MACHINERY CO., LTD.

Applicant.

OPPOSER PLASTI-FAB'S MOTION FOR SUSPENSION WITHOUT CONSENT

Plasti-Fab Ltd. ("Opposer") respectfully moves the Trademark Trial and Appeal Board ("TTAB") to suspend the above-captioned proceedings, pursuant to 37 CFR § 2.117(c).

On April 20, 2009, Opposer filed its Motion For Default Judgment And, In The Alternative, For Permission To File Motion For Summary Judgment Outside Of The Discovery Period (the "Motion"). Applicant's response to the Motion is due on May 11, 2009. However, pursuant to the March 9, 2009 Order from TTAB, Opposer's testimony period currently is set to expire on May 8, 2009.

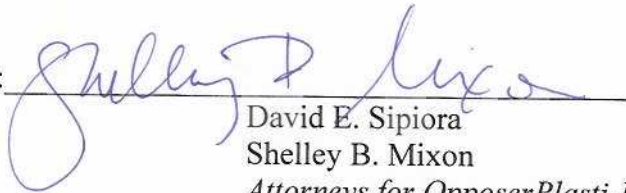
Opposer conferred with counsel for Applicant to request Applicant's consent to this request. Applicant did not consent. Accordingly, to allow time to complete briefing on the Motion, Opposer now moves without Applicant's consent, for a suspension of the proceedings for sixty (60) days, or until the TTAB issues a ruling on the Motion.

Respectfully submitted,

TOWNSEND *and* TOWNSEND *and* CREW LLP

Date: May 8, 2009

By:

A handwritten signature in blue ink, appearing to read "Shelley B. Mixon", is written over a horizontal line.

David E. Sipiora

Shelley B. Mixon

Attorneys for OpposerPlasti-Fab Ltd

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CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2009, I served the foregoing OPPOSER PLASTI-FAB'S MOTION FOR SUSPENSION WITHOUT CONSENT on counsel for Applicant by depositing a true and correct copy of the same with the United States Postal Service, first class mail, postage prepaid, in an envelope addressed to:

Bassam N. Ibrahim
Buchanan, Ingersoll & Rooney PC
1737 King Street, Suite 500
Alexandria, Virginia 22314-2727

Kara E. Fuldner

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